

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALBERTO RAMOS,

Plaintiff,

v.

PALM WEST CORPORATION,
PALM WEST CORPORATION D/B/A “THE
PALM”,
LANDRY'S SEAFOOD HOUSE - NORTH
CAROLINA, INC.,
RICHARD HAMMILL, Individually
and CRAIG LEVY, Individually

Defendants.

Civil Action No. 1:23-cv-09441-JMF

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and all of the prior pleadings and proceedings in this action, Defendants Palm West Corporation d/b/a the Palm West¹ and Tryon & Stonewall Restaurant, Inc. f/k/a Landry’s Seafood House – North Carolina, Inc.², through their undersigned counsel, will move this Court, before the Honorable Jesse M. Furman, at the United States District Court, United States Courthouse, 40 Centre Street, Room 2202, New York, NY 10007, on a date and time to be set by the Court, for an Order: (i) for partial dismissal of the Complaint filed by Plaintiff Alberto Ramos, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure; and (ii) granting any other relief the Court deems appropriate.

[signature page follows]

¹ Incorrectly pled as Palm West Corporation d/b/a “The Palm.”

² Incorrectly pled as Landry’s Seafood House – North Carolina, Inc.

Dated: December 29, 2023
New York, New York

Respectfully submitted,

By: /s/Glenn S. Grindlinger

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and Tryon & Stonewall Restaurant, Inc. f/k/a
Landry's Seafood House – North Carolina, Inc.*